
EPA REGION 9/SOUTH COAST AQMD MEETING

RECLAIM TRANSITION & NEW SOURCE REVIEW

AUGUST 8, 2019

TELECONFERENCE

CALL-IN NUM

MEETING NU: Ex. 6 PP / Ex. 7(C)

PASSWORD:

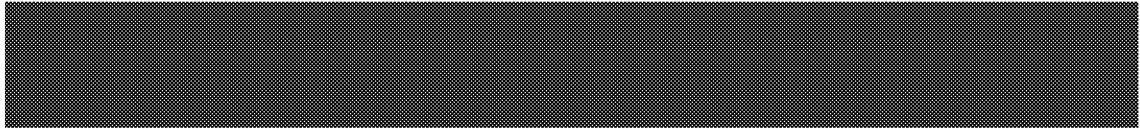
EPA Draft Agenda for August 15, 2019 Meeting

- Confirmation of recommendations for:
 - NSR applicability
 - NSR offsetting
- Federal – 110(I) and State SB288 demonstration
- Discussion of Regulation XIII – Rule 1304 (c)(4) – Equipment
Complying with South Coast AQMD, State, or Federal requirements
- AB 617 timing
- Draft list of issues



CONFIRMATION OF RECOMMENDATIONS

NSR Applicability & NSR Offsetting



3

Proposed NSR Applicability for Modifications to Existing Post-NSR Emission Sources

- Applicability based on Actual Emissions-to-PTE test
- If there is an increase between pre-modification Actual Emissions and post-modification PTE, then project is subject to:
 - ✧ BACT
 - ✧ Offsetting
 - ✧ Modeling
- No impact on minor sources
 - ✧ Modifications for post-NSR minor sources will continue to use PTE-to-PTE, as required by current Regulation XIII

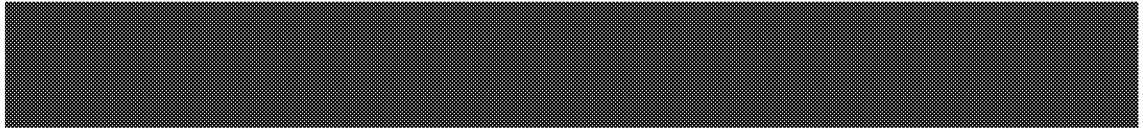
Proposed Methodology To Determine Amount of Offsets Required

- Staff proposes a two tier offsetting calculation for modifications to existing post-NSR emission sources:
 - First Tier: Allow use of PTE-to-PTE when
 - ✧ Actual emissions are at least 80% of the PTE
 - ✧ Past emission increases were fully offset less than 5 years prior to an application deemed complete
 - Second Tier: Require Actual Emissions-to-PTE for all other situations



RECLAIM TRANSITION

Federal and State Demonstrations



6

Federal and State Demonstrations

- An equivalency demonstration is needed for:

Federal
CAA 110(l)

SIP commitment for RECLAIM program to achieve 12 tpd shave

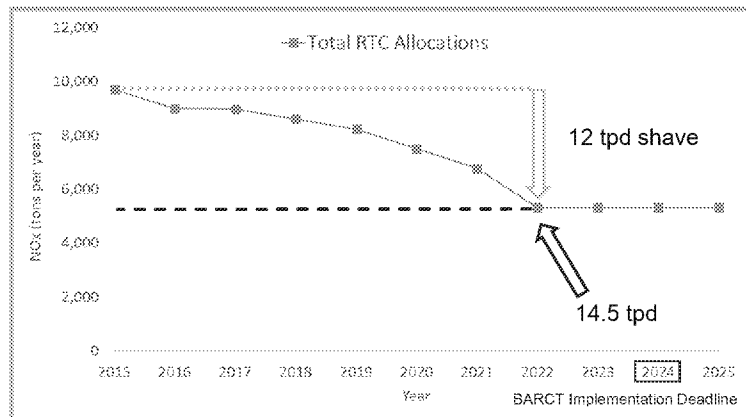
SB 288

Facilities that were permitted after the start of RECLAIM and facilities with emission increases above their starting allocation have ongoing holding requirement at the commencement of each compliance year

- May demonstrate equivalency programmatically for both the SIP commitment and for RECLAIM NSR holding requirements

SIP Commitment and NSR Obligations

- ※ In 2022, total RTC allocations for RECLAIM will be 14.5 tons per day (tpd) [12 tpd shave]
- ※ Staff is proposing a programmatic demonstration in 2025 where actual emissions will be below 14.5 tpd
- ※ 2025 was selected to allow one year of data after the AB 617 implementation date of December 31, 2023
- ※ Staff is considering either an on-going or one-time equivalency demonstration



Concepts for Programmatic Equivalency Demonstration

- Concept #1 - On-going demonstration
 - Beginning 2025 and every year thereafter compare actual emissions from RECLAIM facilities to the 14.5 tpd
 - If actual emissions are greater than 14.5 tpd, notification and assessment of potential remedies (see next slide)
- Concept #2 - One-time demonstration
 - In 2025, based on 2024 actual reported emissions compare actual emissions from RECLAIM facilities to the 14.5 tpd
 - One-time demonstration one year after SIP approval of all rules (Regulation XI, XIII, XX), if after 2025
 - If actual emissions are greater than 14.5 tpd, notification and assessment of potential remedies (see next slide)

Notification and Assessment of Potential Measures

- In the event that the 14.5 tpd threshold is exceeded:
 - Notify the Board, U.S. EPA, and CARB within 45 days of exceedance
 - Conduct an assessment of why 14.5 tpd is exceeded
 - Report to the Board within 60 days from notifying the Board of the following:
 - Reason(s) for exceedance
 - Remedies for exceedance
 - Timeframe to implement remedies
- This approach will determine what specific measures, based on the cause of the exceedance, are needed to reduce emissions below the 14.5 tpd threshold (e.g. required action might be short-term, source-specific, etc.)

10

Recommendation

- Staff recommends - Concept #2 - One-time demonstration in 2025 based on 2024 actual emissions
 - One-time demonstration after SIP approval of all rules (Regulation XI, XIII, XX), no earlier than 2025
 - After facilities transition out of RECLAIM, Regulation XIII will apply
 - Any offsets generated from RECLAIM sources will follow Regulation XIII discounting and accounting
 - Compliance with command-and-control rules will lower NOx concentration limits that will be reflected and enforced in facility permits
 - Any increase in emissions beyond permitted levels will be at BACT